



October 1, 2019

Sylvia Vanderspek, Branch Chief
Air Quality Planning Branch
Air Quality Planning and Science Division
California Air Resources Board
P.O. Box 2815
Sacramento, CA 95812

RE: Exceptional Event Demonstrations for 2018 – January 20; February 11; February 19; April 11 & 12; April 16; and April 19.

Dear Ms Vanderspek

The Imperial County Air Pollution Control District (Air District) is requesting the exclusion of ambient air quality data measured as an exceedance of the PM₁₀ National Ambient Air Quality Standard (NAAQS) at State and Local Air Monitoring Stations (SLAMS) located within Imperial County, California. As required by the Exceptional Events Rule the Air District is submitting to the California Air Resources Board six (6) Exceptional Event (EE) Demonstrations providing regulatory evidence that ambient air quality in Imperial County was affected by high winds causing an exceedance of the PM₁₀ NAAQS¹.

The six (6) EE Demonstrations address non-technical and required core technical elements.² Based on the interim guidance and the final guidance issued October 3, 2016, the analysis indicates that natural events occurred on the specified days when elevated winds associated with different weather disturbances passed through southeastern California affecting Imperial County. The regional weather systems brought elevated gusty winds, at or above 25 mph, across the natural open areas (including mountainous areas) surrounding and within Imperial County. Dust particles from largely natural open areas to the west, southwest or the south and southeast transported by winds affected air quality and caused exceedances in Imperial County. Supporting evidence is provided from the National Weather Service indicating the type and intensity of the weather disturbance.

¹ "Treatment of Data Influenced by Exceptional Events: Final Rule", 72 FR 13560, March 22, 2007

² Interim Guidance on the Preparation of Demonstrations in Support of Requests to Exclude Ambient Air Quality Data Affected by High Winds Under the Exceptional Events Rule, United States Environmental Protection Agency, May 2013

The Air District respectfully requests that after your review, you forward copies of the final documents to the US EPA, Region IX office showing that a natural event did occur which caused exceedances of the PM₁₀ NAAQS.

Public Comment Process

As agreed upon by the US EPA, CARB and the Air District, these six (6) EE Demonstrations are undergoing the Public Review process concurrently with the formal submittal to CARB for remittance to US EPA.

The Air District published, in the local newspaper of greatest circulation, a "Notice of Availability of the demonstration of the occurrence of an Exceptional Event" on September 10, 2019 and September 20, 2019. The notices solicit public comment regarding the request by the Air District to exclude PM₁₀ monitored data affected by a natural event during the days identified in the subject line. The comment period ends, October 10, 2019 and October 20, 2019, 30 days after publication.

Upon the ending of the review period, the Air District will remit to CARB and US EPA all comments received, evidence of the publication, and a formal letter indicating the review period has ended and how comments were addressed that either dispute or contradict factual evidence used in the demonstration.

As always, should you have any questions or require any further information, please contact the undersigned at (442) 265-1800

Sincerely,

A handwritten signature in black ink, appearing to read "Matt Dessert". The signature is stylized with a large, sweeping "M" and a trailing flourish.

Matt Dessert
Air Pollution Control Officer

CC: Gwen Yoshimura, US EPA (electronic only)